

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARTIN J. WALSH,
SECRETARY OF LABOR,
UNITED STATES DEPARTMENT OF
LABOR,

Plaintiff,

V.

SUPERIOR HEALTH, INC. and TINA
BELL,

Defendants.

Civil Action No. 5:21-cv-02782

PLAINTIFF'S MOTION FOR DISCOVERY SANCTIONS

Plaintiff, the Secretary of Labor, files this Motion under Federal Rule of Civil Procedure 37 for discovery sanctions against Defendant Superior Health, Inc. and Defendant Tina Bell. In support thereof, Plaintiff submits a memorandum of law, the declaration of Alejandro Herrera, with attachments, and a proposed order.

Wherefore, Plaintiff respectfully requests that the Court grant the Motion, award the relief as set forth in Plaintiff's memorandum of law and proposed order, and enter all other relief that the Court finds just and appropriate.

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Date: March 10, 2023

/s/ Alejandro A. Herrera

Alejandro A. Herrera

Senior Trial Attorney

U.S. DEPARTMENT OF LABOR

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that, on March 10, 2023, a correct copy of the foregoing Plaintiff's Motion for Discovery Sanctions and supporting documents were served with the Clerk of Court by using the CM/ECF system, which will provide notice and an electronic link to these documents to the attorneys of record in this case.

/s/ Alejandro A. Herrera
Alejandro A. Herrera
Senior Trial Attorney